

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

| | | |
|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA | § | |
| | § | |
| vs. | § | Case No. 1:24-CR-00092-RP |
| | § | |
| MOINUDDIN MOHAMMED | § | |

UNOPPOSED MOTION TO CONTINUE PLEA DEADLINE, TRIAL, AND
SCHEDULING ORDER DEADLINES

TO THE HONORABLE ROBERT PITMAN, U.S. DISTRICT JUDGE FOR THE WESTERN
DISTRICT OF TEXAS, AUSTIN DIVISION:

Defendant, Moinuddin Mohammed, respectfully files this Unopposed Motion to
Continue Plea Deadline, Trial, and Scheduling Order Deadlines. In support, and for good
cause, Mr. Mohammed shows the following:

1. This matter is currently set for Trial on July 15, 2024. Docket Call and Pretrial
Motions are scheduled for July 3, 2024. The deadline for submission of any plea
agreements is June 24, 2024.
2. The undersigned were recently listed as counsel of record for Defendant,
following a Motion to Substitute Counsel which was granted by this Court on June
11, 2024.
3. Additional time is necessary for the undersigned to receive the discovery in this
matter and review same with the Defendant.
4. Undersigned has contacted counsel for the Government, AUSA Keith Henneke,
regarding this Motion for Continuance. Mr. Henneke is unopposed to this Motion.

5. The Defendant acknowledges that any continuance granted in this cause is excludable under the Speedy Trial Act as delay resulting from a continuance granted at the request of defense counsel because the ends of justice served by the continuance outweigh the interest of the public in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). The Defendant does not waive his rights under the Sixth Amendment.
6. For the above reasons, Mr. Mohammed respectfully moves to continue trial and all corresponding deadlines for a period of sixty (60) days.

Accordingly, Mr. Mohammed prays that this Motion to Continue be granted, and that this matter be continued for a period of sixty (60) days.

Respectfully submitted.

GOLDSTEIN & ORR

By: /s/ John S. Gilmore

John S. Gilmore

State Bar No. 24096676

Aaron M. Diaz

State Bar No. 24108453

315 E. Commerce St., Suite 301

The Historic Staacke-Stevens Bldg.

San Antonio, Texas 78205

Phone: (210) 226-1463

Email: johnstuartgilmore@gmail.com

Email: aaron@goldsteinorr.law

*Attorneys for Defendant, Moinuddin
Mohammed*

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2024, the above Motion to Continue was served on Assistant United States Attorney Keith Henneke through the PACER electronic filing system.

By: /s/ John S. Gilmore
John S. Gilmore

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for the Government, AUSA Keith Henneke, was contacted regarding this Motion for Continuance. Mr. Henneke is unopposed to the relief requested in this Motion.

By: /s/ John S. Gilmore
John S. Gilmore

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

UNITED STATES OF AMERICA

vs.

MOINUDDIN MOHAMMED

§
§
§
§
§

Case No. 1:24-CR-00092-RP

ORDER

On this ____ day of _____, 2024, the Court considered Defendant Moinuddin Mohammed's Unopposed Motion to Continue Plea Deadline, Trial, and Scheduling Order Deadlines.

Having considered same, said motion is hereby:

(GRANTED).

(DENIED).

SIGNED this ____ day of _____, 2024.

HONORABLE ROBERT PITMAN
U.S. DISTRICT JUDGE
WESTERN DISTRICT OF TEXAS